

Exhibit N

Estate of John Dong

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

-----X
In Re:

TERRORIST ATTACKS ON
SEPTEMBER 11, 2001

03-MDL-1570 (GBD)(SN)

-----X

ELAINE E. MANDELKOW, et al.,

**AFFIDAVIT OF
KATHERINE DONG**

Plaintiffs,

20-CV-00315 (GBD)(SN)

v.

ISLAMIC REPUBLIC OF IRAN,

Defendant.

-----X

STATE OF CALIFORNIA)
 : SS.:
COUNTY OF ALAMEDA)

KATHERINE DONG, being duly sworn, deposes and says:

1. I am a plaintiff in the within action, am over 18 years of age, and reside at 37504 Zephyr Terrace, Fremont, CA 94536.

2. My current age is 38, having been born on October 17, 1983.

3. I am the daughter of John Dong, upon whose death my claim is based, and submit this Affidavit in connection with the pending motion for a default judgment and in support of the claim on behalf of my father's estate.

4. My father passed away from liver cancer and pancreatic cancer on January 31, 2015. It was determined by the World Trade Center Health Program that his illnesses were deemed to be causally connected to his exposure to the toxins resulting from the 9/11 terrorist attacks.

5. On June 22, 2015, I was appointed personal representative of my father's estate in the New York County, New York Surrogate's Court.

6. My father and I became especially close the last two years before his passing. He had recently retired at that time, and I was working night shifts in the hospital as a nurse. He

would pick me up from my night shifts and drive me home to Astoria. We would just have one-on-one talks. If I had any issues, I was able to talk to him about them. He would come to my house during the week to eat lunch and hang out. We would see my grandma in Brooklyn and my uncle in New Jersey. He would always spend time with me when we both could. Growing up, he was working a lot. He worked for Verizon, the telecommunications company. My brother and I weren't as close with him when we were growing up. We never really got to have deep talks with him or spend a lot of time with him until we got older.

7. On 9/11, my dad was working in Brooklyn. He rushed back home when he learned of the attacks on the World Trade Center. He lived at 180 Park Row, right near the Twin Towers. Verizon sent him down to the World Trade Center to work and volunteer. He was there for about two- or three-months volunteering, repairing cables, and fixing the telecom machinery. This was in the time before smart phones. He would take photos of himself repairing phone lines with his coworkers. He was upset about the working conditions—it was hot, too hot to wear the protective gear that they gave him. He was underground most of the time, and the heat was unbearable, with no fresh air coming in and surrounded by dust and debris. He couldn't breathe down there.

8. In December 2014, my brother, dad and I went out for soup dumplings when my brother noticed that my dad's eyes were yellow. I'm an oncology nurse, and I asked my coworkers what I should do. He was a healthy guy and, other than some indigestion issues, never had a problem with his health. They told me I should bring him to the emergency room to get checked out. We took him to NYU Langone. Later that night, I got a call from one of the nurses with the preliminary results from the CAT scan. They found multiple masses on his liver and pancreas. He was diagnosed with metastatic Stage IV liver cancer and pancreatic cancer.

9. He lost weight very quickly. He was always a pretty muscular person and had a good amount of weight on him. To see his weight loss so quickly was very scary. He had jaundicing of the skin. I took intermittent FMLA, thinking, "Oh, I'll take my dad to his cancer treatments." But his condition soon deteriorated, and my dad was admitted to hospice care. I took full FMLA to care for him in his final weeks. Even at his sickest, he tried to be as independent as he could.

10. Mentally, he was withdrawn. He was in his own thoughts. He didn't want to make it seem like he was scared to die. He would tell me, "It is what it is." Toward the end, he was

pretty unsteady. He would get confused. I remember there were times we were at the hospital and my brother Kevin would come in. My dad would confuse him for my uncle Freddy. He would just stare and it seemed like he wasn't even there, just staring into space. It was unsettling. It was sad to watch him deteriorate.

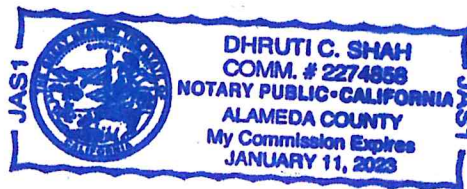
11. He was only sixty-four years old. I honestly thought I would have at least twenty more years with him. He would have made an amazing grandfather. I wish I could've given him that opportunity before he passed. His death caused him to miss out on travel and much more time spent with his children.

12. I want people to know how caring my father was. He was a big jokester, and he would never complain. He would help people out in his community, even those he didn't know well. He would do anything that his family needed. I want people to know that we lost somebody with a very good heart, and we lost him too early.


KATHERINE DONG

Sworn to before me this
14th day of April, 2022


Notary Public



04/14/2022

Estate of George Eysser

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

-----X
In Re:

TERRORIST ATTACKS ON
SEPTEMBER 11, 2001

03-MDL-1570 (GBD)(SN)

-----X
ELAINE E. MANDELKOW, et al.,

**AFFIDAVIT OF
ELAINE EYSSER**

Plaintiffs,

20-CV-00315 (GBD)(SN)

v.

ISLAMIC REPUBLIC OF IRAN,

Defendant.

-----X
STATE OF NEW YORK)
 : SS.:
COUNTY OF NASSAU)

ELAINE EYSSER, being duly sworn, deposes and says:

1. I am a plaintiff in the within action, am over 18 years of age, and reside at 2 Renee Road, Syosset, NY 11791.

2. My current age is 79, having been born on May 26, 1942.

3. I am the wife of George Eysser, upon whose death my claim is based, and submit this Affidavit in connection with the pending motion for a default judgment and in support of the claim on behalf of my husband's estate.

4. My husband passed away from lung cancer on June 13, 2015. It was medically determined by the World Trade Center Health Program that this illness was causally connected to the toxins resulting from the September 11, 2001 terrorist attacks.

5. On August 8, 2016, I was appointed personal representative of my husband's estate by the Nassau County, New York Surrogate's Court.

6. George and I had a great relationship. We married in 1969 and were married for forty-six years before George died. We got along very well all of our lives. We had children and saw both of them get married and have children of their own. We traveled a lot. After George

retired, I continued working as a teacher. It was a great life. He was a good man, and I miss him.

7. George had just retired from the FDNY in May or June of 2001. He wasn't working for that entire summer. Then, 9/11 happened, and he pulled his retirement papers so that he could respond to the World Trade Center collapse. I came home from work that day, and George told me he was going down to Manhattan. He drove down to the site, where he worked nearly every day until operations shut down in the spring of 2002. He dug through the rubble and assisted with search and recovery. He also was the chief of Marine Operations. He would take the families of victims on a fire boat from the Brooklyn Navy Yard to the World Trade Center. He'd take the family members over to the site, where they could stand and look over the pile from a viewing deck. Then, he'd ferry them back to Brooklyn. He worked near the World Trade Center on a consistent basis, about five days per week.

8. George was enrolled in the World Trade Center Health Program. He had some breathing problems as the years went on, and had nodes in his lungs as early as 2011. At that time, George's lung cancer was diagnosed as Stage I. The surgeon removed his nodes, and we had no more lung issues for several years. He also had some heart issues. George started to get a cough towards the end of 2014, which was getting worse and worse each day. He would have breathing problems, pressure in his chest, and a fluttering feeling in his chest and lungs.

9. I remember how bad his breathing problems had gotten. George always had a cough and was always clearing his throat. His ability to walk decreased. If we were going away on vacation, he could only walk a few steps before having to stop and rest. I remember going in the early spring of 2015 to see a Broadway show with him. He had to sit on the step of the theatre to catch his breath before going inside. When he was hailing a cab after the show, he was out of breath then too.

10. George's illness definitely impacted him emotionally. He was very upset, expecting the worse. He had a lot of anxiety, nervousness, and depression. George was an emotionally strong person, but the worry took a huge toll on him, especially because he had no real diagnosis, when he knew something was terribly wrong.

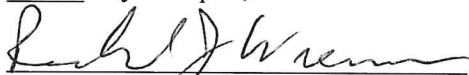
11. An FDNY medical officer diagnosed him with Stage IV lung cancer in the spring of 2015. His condition deteriorated very rapidly from the time he went into the hospital in mid-May 2015. For about a month, doctors didn't have an exact diagnosis. He was officially

diagnosed on a Thursday, and he died the next Saturday. He died on June 13, 2015.

12. George was a wonderful person and a very good husband. He was kind, friendly, and outgoing. He was loved by so many people. I think the most significant thing about his illness and death is that he loved the FDNY very much. He was happy that he chose it as a career. He worked his way through the ranks and retired as a Battalion Chief. He had no regrets that he chose a dangerous career, which 9/11 made even more dangerous. That was something we only learned afterwards. Still, he had no regrets. He loved what he was doing. He did not want to leave any man behind. My son is a firefighter too, inspired by his father. They worked together on the pile. George had no regrets, no concerns. He wanted to do it. The camaraderie meant that much to him. He worked as hard as he could for those who were lost.


ELAINE EYSSER

Sworn to before me this
19 day of April, 2022


Notary Public

RICHARD JOSEPH WIEMER
NOTARY PUBLIC - STATE OF NEW YORK
NO. 01WI6415974
QUALIFIED IN NASSAU COUNTY
COMMISSION EXPIRES 04/05/2025

Estate of Kenneth John Finck

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

-----X
In Re:

TERRORIST ATTACKS ON
SEPTEMBER 11, 2001

03-MDL-1570 (GBD)(SN)

-----X
ELAINE E. MANDELKOW., et al.,

AFFIDAVIT OF
MARY D. FINCK

Plaintiffs,

20-CV-00315 (GBD)(SN)

v.

ISLAMIC REPUBLIC OF IRAN,

Defendant.

-----X
STATE OF NEW YORK)
 : SS.:
COUNTY OF GREENE)

MARY D. FINCK, being duly sworn, deposes and says:

1. I am a plaintiff in the within action, am over 18 years of age, and reside at PO Box 1038 Windham NY 12496

2. My current age is 79, having been born on September 11, 1942.

3. I am the wife of Kenneth John Finck, upon whose death my claim is based, and submit this Affidavit in connection with the pending motion for a default judgment and in support of the claim on behalf of my husband's estate.

4. Kenneth passed away from metastatic pancreatic cancer on July 14, 2011. It was medically determined that this illness was causally connected to his exposure to the toxins resulting from the September 11, 2001 terrorist attacks.

5. On December 9, 2014, I was appointed personal representative of Kenneth's estate by the Greene County, New York Surrogate's Court.

6. Kenneth was retired from the fire department, and we had moved upstate to a big house with a pool for the grandkids. It was very good. We enjoyed it very much. We played golf, we had friends, grandchildren - it was perfect.

7. Kenneth had retired shortly before the events of 9/11 and did not respond to the World Trade Center the day of the attacks. This did not stop him from responding soon after. Kenneth had worked for over twenty years as an FDNY fireman. His old firehouse was right across the street from the World Trade Center. Kenneth responded to the World Trade Center on September 13, 2001, and he continued to perform search and recovery for several months. He wanted to help his comrades who were there and be involved in any way that he could.


8. A few years after the events of 9/11, I began to notice Kenneth experiencing discomfort in his throat. I could tell he didn't feel well and noticed he was constantly rubbing his throat. Finally, in June 2010, we decided to go to the doctor for some tests and discovered he had metastatic pancreatic cancer. Before, he was a very healthy and active individual who enjoyed working out. He lost weight in a way no active, health-conscious man should. The signs that his health was rapidly deteriorating were evident. He passed the year after his diagnosis in July.

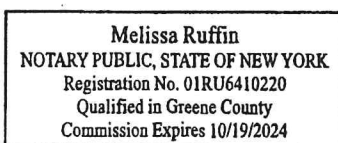
9. Kenneth's illness was devastating on him both physically and mentally. He went from being a man who enjoyed working out daily to a weak sickly individual. His weight loss was horrific, going from a two-hundred-pound man to nearly nothing. This was very hard on him. He was very upset and was aware of what was happening to him. By the end, he was very tired and although he did not want to leave his family, he couldn't continue on any further.

10. Kenneth was a kind, caring, and compassionate man who is very well missed by all.


MARY D. FINCK

Sworn to before me this
17th day of ~~April~~ ^{May}, 2022


Notary Public
Melissa Ruffin



Nicholas Gerard Finelli

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

-----X

In Re:

TERRORIST ATTACKS ON
SEPTEMBER 11, 2001

03-MDL-1570 (GBD)(SN)

-----X

ELAINE E. MANDELKOW, et al.,

AFFIDAVIT OF
LUCY J. FINELLI

Plaintiffs,

20-CV-00315 (GBD)(SN)

v.

ISLAMIC REPUBLIC OF IRAN,

Defendant.

-----X

STATE OF NEW YORK)
 : SS.:
COUNTY OF WESTCHESTER)

LUCY J. FINELLI, being duly sworn, deposes and says:

1. I am a plaintiff in the within action, am over 18 years of age, and reside at 92 Atlantic Avenue, Hawthorne, NY 10532.
2. My current age is 68, having been born on July 23, 1953.
3. I am the wife of Nicholas Gerard Finelli, upon whose death my claim is based, and submit this Affidavit in connection with the pending motion for a default judgment and in support of the claim on behalf of my husband's estate.
4. My husband passed away from esophageal cancer on June 8, 2013. It was determined that this illness was causally connected to his exposure to the toxins resulting from the September 11, 2001 terrorist attacks.
5. On August 5, 2013, I was issued Letters of Administration on behalf of my husband's estate by the Westchester County, New York Surrogate's Court.
6. My husband and I were incredibly happy together. We enjoyed spending a lot of time together doing various activities. We had many shared interests. We were really looking

forward to spending our retirement years together and enjoying the freedom that came along with it. After he got sick, we quickly saw this opportunity evaporate.

7. I was very aware of Nicholas's exposure on 9/11, as all NYPD officers were called down to the World Trade Center site. He continued working non-stop for several months. What he experienced first-hand he described as a nightmare, and this nightmare continued on into the spring of 2002.

8. It was somewhere between 2010 and 2011 that I first began to notice physical changes in Nicholas, and I began to worry for his well-being. I really looked at him one day, and I saw he was too thin. Almost skeletal. He had been working a lot. Working crazy hours, with lots of overtime. I noticed that he started having difficulty eating and swallowing, and this is when we decided he needed to see a doctor. Nick didn't want to go to the doctor, but I convinced him. The doctor told him that he needed to see another few doctors, who would run another few tests. Nick was determined to continue to go to work, but the doctor said, "Work is over. You need to quit immediately." After more tests, we found out he had esophageal cancer. Instead of operating first, they wanted him to have some cancer treatments. Chemotherapy made Nicholas sick, and despite a successful operation, his cancer continued to progress to the point that he needed a feeding tube and looked like a skeleton. Eventually, he succumbed to his cancer.

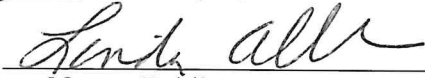
9. Despite having this disease and undergoing these treatments, he was still a good, positive person. When he'd talk, he was so animated. Even though he was dying, he never dwelled on it. He was just a great guy. I could've never done what he did, gone through what he went through. Despite putting a positive face on, my husband suffered tremendously.

10. Nicholas's death was a real loss to society. He was one of the best people I've ever known. He was so good, so kind, so sweet. Just incredible. That's all I could say. He never held a grudge. He was always positive; he was just a great guy. I was lucky to have him although I didn't

have him long enough. In regard to the terrorist attacks, Nick said "They have to pay for what they did to us." It was very hard. That was the only time I'd see him angry.


LUCY J. FINELLI

Sworn to before me this
27 day of April, 2022


Notary Public

Linda Allen
Notary Public, State of New York
Reg. No. 01AL6281674
Qualified in Dutchess County
My Commission Expires 5-13-2025

James William Mandelkow Jr.

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

-----X
In Re:

TERRORIST ATTACKS ON
SEPTEMBER 11, 2001

03-MDL-1570 (GBD)(SN)

-----X
ELAINE E. MANDELKOW, et al.,

AFFIDAVIT OF
ELAINE E. MANDELKOW

Plaintiffs,

20-CV-00315 (GBD)(SN)

v.

ISLAMIC REPUBLIC OF IRAN,

Defendant.

-----X
STATE OF NEW YORK)
 : SS.:
COUNTY OF KINGS)

ELAINE E. MANDELKOW, being duly sworn, deposes and says:

1. I am a plaintiff in the within action, am over 18 years of age, and reside at 340 16th Street, Brooklyn, New York 11215.

2. I am currently 62 years old, having been born on August 25, 1959.

3. I am the wife of James (Jim) William Mandelkow Jr., upon whom my claim is based, and submit this Affidavit in connection with the pending motion for a default judgment and in support of the claim on behalf of my husband's estate.

4. Jim passed away from gastric/esophageal cancer on December 10, 2013 at the age of 54. It was medically determined that this illness was causally connected to his exposure to the toxins resulting from the September 11, 2001 terrorist attacks.

5. On September 30, 2015, I was issued Letters of Administration on behalf of my husband's estate by the Surrogate's Court of the State of New York, Kings County.

6. Jim and I had a wonderful, loving relationship. We did practically everything together. We enjoyed traveling, often to Atlantic City or to see relatives. I have a bad back, so Jim was always my chauffer. He took me shopping, to doctor's appointments, wherever I

needed to go. Our favorite thing to do, however, was spend time together with our three children. Jim was a real handyman around the house, and he used to do everything himself. He often got our boys involved in helping him so they could learn as well. After his passing, I had to do all those things myself or hire people to help me.

7. Jim was a Deputy Chief Inspector for the FDNY. He was stationed at the Duane Street Firehouse, located at 100 Duane Street. He began inspecting buildings within the exposure zone every day for three months, starting on September 12, 2001. He was constantly searching through dusty buildings surrounding the exposure zone, breathing in the toxic air.

8. In the beginning of 2013, doctors at NYU discovered a nodule on Jim's kidney. He had lost twenty-five pounds, which gave me cause for alarm. We went to see a vascular doctor who discovered that Jim had four blood clots, two in each leg. On May 2, 2013, he was put on heavy-duty blood thinners. Two days later, Jim was vomiting non-stop. The following Monday (May 6th), he still went into work. He came home around noon, not feeling well, so I took him to the hospital. The following day, on May 7th, Jim was diagnosed with Stage IV esophageal cancer. The cancer had already spread to his stomach.

9. The day we went to the kidney doctor, Jim weighed 301 pounds. Six months later, he was 125 pounds. In a very short time, he went from a perfectly healthy man to being terminally ill. This was completely shocking to me. Jim had undergone an MRI shortly before we learned of the kidney nodule. I thought to myself, "How could the doctors have missed this tumor?" But that was the nature of esophageal cancer—it grew extremely quickly and unexpectedly. We barely had time to grasp that Jim was sick, let alone wrap our heads around the fact that he was going to die.

10. Jim couldn't eat. He couldn't swallow. The esophageal cancer had spread all the way from his throat to his stomach. I would make him shakes with all the vitamins and calories he needed for the day. He would take all day long to drink it, because he could hardly swallow past the tumor. I think he only lasted as long as he did because he was able to eat Goldfish crackers. They would dissolve in his mouth, and he could swallow them easily. But, basically, Jim starved up until his death.

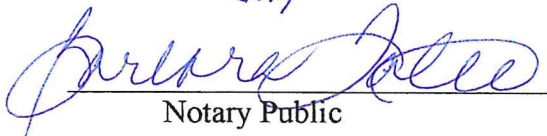
11. Toward the end of his life, Jim was on a fentanyl patch. He was heavily medicated and sleeping all the time. He had zero quality of life for the last month of his life. Jim

was a frail shell of a person when he died. But he never stopped fighting. When he was given the option to go to hospice or try another round of chemo, he chose another round of chemo. He fought the hard fight right up until the end. It hurt him terribly to think of leaving his family behind.

12. Jim didn't deserve to suffer the way he did. He could have had so many wonderful years left to his life, but it was cut short way too soon, simply for doing his job and what he loved. He will always be a hero in his family's eyes.


ELAINE E. MANDELKOW

Sworn to before me this
9th day of ~~May~~ July, 2022


Notary Public

